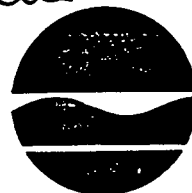


New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 - 7010



Thomas C. Jorling
Commissioner

APR 25 1990

Mr. James Lanzo
Project Manager
URS Consultants
570 Delaware Avenue
Buffalo, New York 14202-1207

Dear Mr. Lanzo:

RE: Ramapo Landfill (Site No. 344004)

The New York State Department of Environmental Conservation (NYSDEC) has reviewed the revised list of ARARs and TBCs for the above site as provided in your March 6, 1990 letter. We have the following comments:

1. It is stated in the March 6 letter that the guidance values in TOGS 1.1.1 (April 1987) will be included in the ARARs. The listing "Guidance Values from TOGS 1.1.1" should appear on the accompanying ARAR/TBC chart with 6 NYCRR Parts 701 and 703.
2. In addition to Air Guide 1, results of the Health Risk Assessment may be used to establish site-specific air emission criteria.
3. CWA, CAA, TSCA, and federal standards pertaining to protection of wetlands (Executive Order 11988), floodplain management (Executive Order 11990), and fish and wildlife are ARARs, not TBCs. CAA standards are found in 40 CFR 1-99.
4. Add 40 CFR 61 Subpart M (disposal standards for asbestos containing material), 29 CFR Parts 1904, 1910 and 1926 (OSHA requirements for worker protection), and the National Historic Preservation Act (assessment of impacts on cultural resources) to the list of ARARs.
5. If "hot spots" are found based on RI results, waste excavation, removal, treatment, and/or disposal may be identified in the FS as appropriate remedial actions. For these actions, 40 CFR 262 (standards applicable to generators of hazardous wastes), 40 CFR 263 (standards applicable to transporters of hazardous wastes), and 40 CFR 268 (land disposal restrictions) would all be applicable.

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Mr. James Lanzo

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We look forward to receiving your further assessment of potential remedial technologies and action-specific ARARs as these are developed by your staff. Please call me at 518-457-1641 if you have any questions.

Sincerely,



Kathleen A. McCue
Project Manager
Bureau of Eastern Remedial Action
Division of Hazardous Waste
Remediation

cc: G. Ostertag, Town of Ramapo

KM:mm

bcc: J. Slack
R. Cozzy
R. Pergadia, Region 3
A. Klauss, Region 3
S. Bates, NYSDOH
R. Nunes, USEPA
J. Kelleher, DOW
A. Fossa, DAR
J. Colquhoun, DFW

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